

EXHIBIT 7

In the Matter Of:

UNITED STATES vs

GOOGLE

TIM CRAYCROFT

August 15, 2023



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Civil Action No: 1:23-cv-00108-LMB-JFA

UNITED STATES, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CONFIDENTIAL VIDEOTAPED DEPOSITION OF TIM CRAYCROFT

August 15, 2023

P R O C E E D I N G S

THE VIDEOGRAPHER: We are now on the record. My name is Davis Baumunk. I am the videographer representing Lexitas. This is a video deposition for the United States District Court for the Eastern District of Virginia, Alexandria Division. Today's date is August 15th, 2023, and the time is 9:14.

This deposition is being held at 1801 California Street, Denver, Colorado, in the matter of United States, et al., versus Google LLC, Case Number 1:23-cv-00108-LMB-JFA.

The deponent is Tim Craycroft. The court reporter is Matthew Moss.

Would all counsel please identify themselves, including remotely, and the witness will be sworn.

MR. FREEMAN: Certainly. Michael Freeman on behalf of the Department of Justice.

MS. GUDZOWSKI: Milosz Gudzowski on behalf of the United States.

MS. SESSIONS: Justina Sessions of Freshfields Bruckhaus Deringer for Google and the witness. I'm joined today by my colleagues on the Zoom, Sara Salem and Veronica Bosco.

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1 Q. Do you know whether there's a
2 difference between retention of chats versus email?

3 A. I know they're both retained. I don't
4 know the exact durations.

5 Q. Have you ever heard the term -- like a
6 "history-off chat"?

7 A. Yes.

8 Q. What does that mean to you?

9 A. It means that -- I think after
10 24 hours, I can't see the chat I've been having with
11 the person on the other end, and same for them.

12 Q. When you use the chat function, what is
13 the default?

14 A. For me, now, it's on. It has been for
15 a while. I don't know what it was before then.

16 Q. Is that something within your control?

17 A. Not anymore.

18 Q. Was it in your control when you
19 started?

20 A. Not -- I could not control the default,
21 but I could switch it either way at some point.

22 Q. What was the default when you started?

23 A. I don't remember. I think it -- yeah,
24 I don't remember. I don't want to speculate.

25 Q. Do you have a general time frame when

1 it -- when you lost the ability to turn it on and
2 off?

3 A. In the last year.

4 Q. Do you remember having any history-off
5 conversations about substantive matters?

6 A. No.

7 Q. My next few questions, I don't want to
8 get into what lawyers have told you, but did you
9 receive a litigation hold at any point since you've
10 been at Google?

11 MS. SESSIONS: You can answer that
12 question "yes" or "no," to the extent you know.

13 A. Yes.

14 Q. (By Mr. Freeman) And whatever advice it
15 has been, have you followed that advice?

16 A. Yes.

17 Q. How long were you in charge of YouTube
18 ads?

19 A. I still am, so --

20 Q. Well, I guess you eventually get a
21 promotion within this?

22 A. No promotion, just more scope.

23 Q. Okay. A larger scope.

24 How long were you only focused on
25 YouTube ads?

REPORTER'S CERTIFICATE

I, Matthew R. Moss, a Registered Professional Reporter, Federal Certified Realtime Reporter, and Notary Public within and for the State of Colorado, commissioned to administer oaths, do hereby certify that previous to the commencement of the examination, the witness was duly sworn by me to testify the truth in relation to matters in controversy between the said parties; that the said deposition was taken in stenotype by me at the time and place aforesaid and was thereafter reduced to typewritten form by me; and that the foregoing is a true and correct transcript of my stenotype notes thereof.

That I am not an attorney nor counsel nor in any way connected with any attorney or counsel for any of the parties to said action nor otherwise interested in the outcome of this action.

My commission expires: April 28, 2025.

Matthew Moss

MATTHEW R. MOSS
Registered Professional Reporter
Federal Certified Realtime Reporter
and Notary Public